

REMARKS

Claims 1-20 are all the claims pending in the application. It is respectfully submitted that pending claims 1-20 define patentable subject matter.

REQUEST FOR INTERVIEW

Applicant respectfully requests a personal interview with the Examiner to discuss the rejection of record under 35 U.S.C. § 102. Specifically, Applicant submits that this rejection is improper because the Radia reference fails to teach each and every limitation in the present claims. As the Federal Circuit has held, a rejection under 35 U.S.C. § 102 is proper only if a single reference teaches each and every limitation in the claims. *Massey v. Del Laboratories, Inc.*, 118 F.3d 1568 (Fed. Cir. 1997). In particular, as set forth below, Radia fails to teach the feature of presorting filter rules based on information contained in the packet, and therefore cannot possibly anticipate the pending claims under 35 U.S.C. § 102.

The present invention is a method of pre-sorting rules for filtering packets within a network to determine whether or not to reject a particular packet. Rather than considering all possible rules, the invention pre-sorts the rules such that only those rules that are applicable to the packet under consideration are considered. Since not all possible rules are considered, processing time is necessarily decreased.

All of the present claims recite the feature of pre-sorting rules based on information contained in the packet itself. None of the references teaches (or suggests) this claimed feature.

Claims 1-20 were rejected under 35 USC 102(e) as being anticipated by Radia et al, U.S. Patent No. 5,848,233. Applicant respectfully traverses this rejection. Applicant respectfully submits that Radia does not anticipate any of the pending claims at least because Radia fails to

select rules for filtering a packet based on a value obtained from at least partially analyzing information in the packet. Although Radia et al may teach presorting rules for filtering packets; Radia teaches presorting rules based on a particular user's login information. In fact, Radia refers to the various filter or rule profiles as "login profiles". See, col. 3, lines 18-20, and col. 7, lines 38-40. That is, the user itself serves as the profile id 402 for selecting a particular set of filtering profiles. See, col. 6, lines 5-8. In Radia, by the time a particular packet is examined, the filtering profiles or possible rules have already been selected or pre-sorted. Col. 7, lines 38-60. This is very different from the claimed invention.

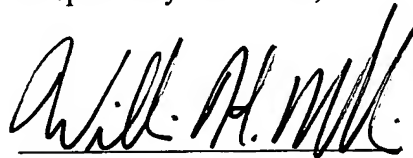
In direct contrast, the claimed invention pre-sorts rules in a completely different way. Rather than using the user's login or other user information to select particular profiles or rules, the claimed invention examines information contained in a packet, and then using this packet information pre-sorts the applicable rules for that packet. As mentioned above, by the time Radia examines a particular packet, the set of profiles or rules have already been selected. Consequently, it is apparent that the claimed invention's method of examining packets to pre-sort filter rules provides a fundamentally different approach from the Radia method, which selects profiles or rules based on user information, not from packet information. Since Radia does not teach each and every limitation in the pending claims (i.e., Radia at least fails to teach operation (e) of selecting rules according to "said value", which value was obtained from examining packet information), Radia could not have anticipated these claims. Moreover, since Radia applies a fundamentally different approach from the claimed invention, it is clear that claim 1 defines patentable subject matter.

Finally, it is noted that the Examiner has identified column 3, lines 5-22 in Radia as teaching other embodiments for pre-sorting rules (i.e., other than using the login information). However, no where does Radia teach pre-sorting rules based on information contained in the packet itself. Consequently, Radia cannot possibly anticipate the pending claims under 35 U.S.C. § 102.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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